

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------------|---|---------------------------|
| ANTHONY MAYS, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs-Petitioners, |) | |
| |) | Case No. 20-cv-2134 |
| v. |) | |
| |) | The Hon. Robert Gettleman |
| THOMAS J. DART, Sheriff of Cook |) | Presiding Judge |
| County, |) | |
| |) | The Hon. M. David Weisman |
| Defendant-Respondent, |) | Magistrate Judge |
| |) | |
| and |) | |
| |) | |
| TEAMSTERS LOCAL 700, |) | |
| |) | |
| Intervenor. |) | |

JOINT STATUS REPORT

Plaintiff Anthony Mays, as representative of a provisionally certified class, by his undersigned attorneys; defendant Thomas J. Dart, Sheriff of Cook County, by his undersigned attorneys; and Intervenor International Brotherhood of Teamsters, by their undersigned attorneys, submit the following Joint Status Report in compliance with the court's order (ECF No. 153):

The parties have continued their discussions regarding the future of the case and have arrived at the following tentative agreements, subject to client approval and ongoing negotiation:

1. The parties have not been able to reach an agreement regarding the resolution of this matter.
2. Defendant Dart intends to seek certiorari from the United States Supreme Court with regard to the Seventh Circuit's decision. Defendant Dart agrees that he will file the petition for certiorari no later than January 15, 2021.

3. The parties have discussed a continuation of the stay of proceedings in combination with a continuation of the preliminary injunction, as modified by the Seventh Circuit, on the following terms:

- a. The continuation of the preliminary injunction would be subject to the existing agreement, including Defendant Dart's right to seek modification or termination of the preliminary injunction and Plaintiffs' right to seek modification or enforcement of the preliminary injunction, should circumstances warrant.
- b. The Sheriff would agree to provide Plaintiff's counsel with certain information while this agreement is in effect. The parties are in discussions about the scope of such information.
- c. The parties' agreement would be presented to Judge Gettleman in the form of an Agreed Order to be signed by the District Court.

4. The parties expect to be in a position to advise the court at the status hearing on Wednesday, November 18, 2020, whether they have reached agreement along the lines outlined in the preceding paragraph.

Respectfully submitted:

PLAINTIFFS' COUNSEL

/s/ Locke E Bowman

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CERTIFICATE OF SERVICE

I, Locke E. Bowman, an attorney, certify that I caused the foregoing document to be filed before the hour of 5:00 p.m. on November 16, 2020 using the court's CM/ECF system, which automatically sent copies to all counsel of record.

/s/ Locke E. Bowman